

David Abrams, Attorney at Law  
305 Broadway Suite 601, New York, NY 10007  
Tel. 212-897-5821 Fax 212-897-5811

August 22, 2018

To: Hon. Lorna G. Schofield (by ECF)  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Daniels v. Jean Pierre Hair Salon, Case No. 17 cv 1399 (LGS)

Dear Judge Schofield:

This office represents the Plaintiff in the above-referenced matter, which is a wage/hour claim brought by my client against her former employer. With respect to the upcoming trial in this matter, I would like to request an order directing the Defendant not to introduce evidence or argument concerning certain irrelevant matters, specifically:

1. The financial state of the Defendant;
2. My client's prior lawsuit against the same Defendant;
3. Any alleged misbehavior of my client unrelated to her employment with the Defendant;
4. Any purported agreement by my client to waive overtime; and
5. Any alleged failure of my client to complain about her wages or hours.

All of these matters are irrelevant to my client's claims but have the potential to unfairly prejudice the jury. F.R.E. 403. Accordingly, I respectfully request that they be excluded.

Respectfully yours,

David Abrams

cc: Defendant's Counsel (by ECF)